

RANDOLPH L. HOWARD (Nev. SBN 006688)
rhoward@klnevada.com
KOLESAR & LEATHAM, CHTD.
400 South Rampart Boulevard, Suite 400
Las Vegas, NV 89145
Telephone: (702) 362-7800
Direct: (702) 889-7752
Facsimile: (702) 362-9472

GARY OWEN CARIS (Cal. SBN 088918)
gcaris@mckennalong.com
LESLEY ANNE HAWES (Cal. SBN 117101)
lhawes@mckennalong.com
ANGELA E. FONES (Cal. SBN 245204)
afones@mckennalong.com
MCKENNA LONG & ALDRIDGE LLP
300 South Grand Avenue, 14th Floor
Los Angeles, CA 90071-3124
Telephone: (213) 688-1000
Facsimile: (213) 243-6330

Attorneys for Plaintiff

**ROBB EVANS OF ROBB EVANS & ASSOCIATES
LLC AS RECEIVER**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBB EVANS OF ROBB EVANS &
ASSOCIATES LLC as Receiver for I Works,
Inc. and other entities as defined in the
Preliminary Injunction Order entered February
10, 2011, and over the assets of Jeremy
Johnson,

Plaintiff,

v.

ARVIN LEE BLACK, II, et al.,

Defendants.

Case No. 2:12-CV-01860-RCJ-PAL

**STIPULATION TO EXTEND TIME TO
RETURN WAIVERS OF SERVICE OF
SUMMONS AND RESPOND TO
COMPLAINT FOR DEFENDANTS
DEBRA GEE, JOHN GEE, THE
GINSBURG TRUST, R. LANE
JACOBSEN, J&P WALLACE FAMILY
LIMITED PARTNERSHIP, LLP,
ROBERT S. KLOSEK, CHRISTOPHER
MARTIN, RICHARD S. RUBIN,
MICHAEL SMITH, AND SANDRA S.
SMITH**

[First Request for Extension of Time]

1 This Stipulation to Extend Time to Return Waivers of Service of Summons and to
 2 Respond to Complaint for Defendants Debra Gee, John Gee, The Ginsburg Trust, R. Lane
 3 Jacobsen, J&P Wallace Family Limited Partnership, LLP, Robert S. Klosek, Christopher Martin,
 4 Richard S. Rubin, Michael Smith and Sandra S. Smith ("Stipulation") is entered into by and
 5 among Robb Evans of Robb Evans & Associates LLC ("Plaintiff"), the Receiver over I Works,
 6 Inc. and over 60 other named Defendant Entities, as well as unnamed subsidiaries and affiliates
 7 thereof, and over the assets of Jeremy Johnson (collectively, the "Receivership Defendants"), and
 8 defendants Debra Gee, John Gee, The Ginsburg Trust, R. Lane Jacobsen, J&P Wallace Family
 9 Limited Partnership, LLP, Robert S. Klosek, Christopher Martin, Richard S. Rubin, Michael
 10 Smith and Sandra S. Smith (collectively "Defendants"), by and through their counsel with
 11 reference to the following facts:

12 RECITALS

13 A. The Plaintiff was appointed Temporary Receiver pursuant to a Temporary
 14 Restraining Order issued on January 13, 2011 in the civil enforcement action entitled Federal
 15 Trade Commission v. Jeremy Johnson, etc., et al., Case No. 2:10-cv-02203-MMD-GWF pending
 16 in the United States District Court for the District of Nevada ("FTC Action"). The Plaintiff
 17 became Permanent Receiver pursuant to a Preliminary Injunction Order issued on February 10,
 18 2011. (The Court in the FTC Action is referred to as the "Receivership Court.")

19 B. On October 30, 2012, Plaintiff filed the Complaint in the above-captioned action.

20 C. On January 11, 2013, Plaintiff mailed Notices of Lawsuit and Requests for Waiver
 21 of Service of Summons to Defendants.

22 D. Pursuant to the Stipulation Regarding Arvin Lee Black, Jr. and Sole Group LLC
 23 Litigation and Order Thereon, approved by the Receivership Court on August 21, 2012,
 24 Defendants had until March 12, 2013 to return the Waivers of Service of Summons to Plaintiff.

25 E. Defendants have requested additional time to return the executed Waivers of
 26 Service of Summons to Plaintiff and to respond to the Complaint.

27 F. This Stipulation represents Defendants' first request for an extension of time to
 28 respond to the Complaint.

1 NOW, THEREFORE, in consideration of the foregoing, the parties hereto do stipulate and
2 agree as follows:

3 1. The deadline for the Defendants, and each of them, to return executed Waivers of
4 Summons of Service to Plaintiff shall be extended to and including March 19, 2013.

5 2. The deadline for the Defendants, and each of them, to respond to the Complaint
6 shall be extended to and including March 19, 2013.

7 WHEREFORE, the parties pray this Honorable Court endorse this Stipulation as outlined
8 herein and set forth below.

9
10 Dated: March 11, 2013

RANDOLPH L. HOWARD
KOLESAR & LEATHAM, CHTD.

MCKENNA LONG & ALDRIDGE LLP
GARY OWEN CARIS
LESLEY ANNE HAWES
ANGELA E. FONES

14
15 By: Angela E. Fones
Angela E. Fones

16 Attorneys for Receiver
17 **ROBB EVANS OF ROBB EVANS &**
18 **ASSOCIATES LLC**

19
20
21
22
23
24
25
26 [SIGNATURES CONTINUE ON NEXT PAGE]
27
28

1 Dated: March 13, 2013

COOGAN & MARTIN, P.C.

2
3 By: 

4 Daniel Coogan
5 Attorneys for **DEBRA GEE, JOHN GEE, THE**
6 **GINSBURG TRUST, R. LANE JACOBSEN,**
7 **J&P WALLACE FAMILY LIMITED**
8 **PARTNERSHIP, LLP, ROBERT S.**
9 **KLOSEK, CHRISTOPHER MARTIN,**
10 **RICHARD S. RUBIN, MICHAEL SMITH**
11 **AND SANDRA S. SMITH**

12 ORDER

13 IT IS SO ORDERED.

14 DATED: March 15, 2013

15 
16 ROBERT C. JONES
17 UNITED STATES CHIEF DISTRICT JUDGE
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I am a citizen of the United States and employed in San Francisco County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 101 California Street, 41st Floor, San Francisco, California, 94111.

On March 11, 2013, I served the **STIPULATION TO EXTEND TIME TO RETURN WAIVERS OF SERVICE OF SUMMONS AND RESPOND TO COMPLAINT FOR DEFENDANTS DEBRA GEE, JOHN GEE, THE GINSBURG TRUST, R. LANE JACOBSEN, J&P WALLACE FAMILY LIMITED PARTNERSHIP, LLP, ROBERT S. KLOSEK, CHRISTOPHER MARTIN, RICHARD S. RUBIN, MICHAEL SMITH, AND SANDRA S. SMITH** upon the parties and/or counsel listed and by the methods indicated on the attached Service List.

I declare upon the penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on March 11, 2013, at San Francisco, California.

/s/ Camilla Glover
Camilla Glover

SERVICE LIST

The following CM/ECF participants were served by electronic means on March 11, 2013:

Gary Owen Caris	gcaris@mckennalong.com, lhawes@mckennalong.com, twaters@mckennalong.com
Lesley Anne Hawes	lhawes@mckennalong.com, gcaris@mckennalong.com, twaters@mckennalong.com
Angela E. Fones	afones@mckennalong.com, cglover@mckennalong.com
Mark H. Gunderson	ascaliala@gundersonlaw.com
Randolph L. Howard	rhoward@klnevada.com, ckishi@klnevada.com, usdistrict@klnevada.com
Matthew R. Lewis	mlewis@rqn.com
Douglas R Rands	doug_rands@sbcglobal.net, carol@rsgnvlaw.com
Shlomo S. Sherman	ssherman@klnevada.com, bbroussard@klnevada.com, ckishi@klnevada.com, usdistrict@klnevada.com

The following non-CM/ECF participants were served by first-class mail, postage prepaid on March 11, 2013:

Justin D. Heideman	Tony Zockoll
Heideman, McKay & Heugly, PLLC	2920 Ebony Circle
2696 N University Ave, Suite 180	St. George, UT 84790
Provo, UT 84604	